

Office of the General Counsel  
Federal Election Commission  
Washington DC

RECEIVED  
FEDERAL ELECTION  
COMMISSION

2011 JAN 28 AM 10: 55

OFFICE OF GENERAL  
COUNSEL

RECEIVED

2011 JAN 28 AM 8: 25

FEC MAIL CENTER

MUR #

6453

January 18, 2011

I am hereby filing a complaint against the Missouri Association of Realtors (MAR) for what I believe are repeated and clear violations of Federal Campaign Finance laws as they relate to SSF/Political Action Committees, and also how they relate to allowed PAC actions by a Trade Organization in these areas.

From 2008 to the present date, including dues billing received at this time for the 2011 calendar year, MAR, a 501c (6) Corporation has included a separate mandatory dues assessment of \$40.00 per member to be used in funding Issues Mobilization Political Action Committee (IMPAC.) IMPAC is a captive PAC that is supposed to be funded solely from voluntary contributions of MAR members and affiliates. This assessment was separate from our regular annual dues, and dedicated solely to funding IMPAC. In 2009, and 2010 I wrote to MAR stating why I thought this action and others involving IMPAC violated Federal Campaign Finance laws. They responded that they would look into it, but then never replied to my further inquiries. I have also communicated this through my local Board to no avail.

I believe that an examination of MAR financial records will show that in 2008 and possibly in 2007, MAR levied a separate mandatory dues assessment and then used funds from that separate assessment to make direct financial contributions to IMPAC out of MAR General Treasury funds. My understanding is that for a Trade Association to do this is a violation of Federal campaign finance laws.

In 2009, The dues billing clearly showed that the mandatory MAR Assessment was for IMPAC. I believe Federal Law clearly states that contributions to a PAC must be voluntary.

In 2010, MAR returned to billing for a separate MAR State Assessment but also included an explanation that stated "In the past, The Missouri Association of Realtors has contributed approximately the amount collected from this assessment to the Issues Mobilization Political Action Fund (IMPAC) and MAR intends to make similar contributions in 2010." This states the clear intent to a mandatory contribution of money from the members and launder it through MAR General Funds and then on into IMPAC.

For the 2011 dues billing, The separate MAR state assessment is now supposed to be set aside to fund an "issues mobilization reserve fund" and may be used at the discretion of the Association. My understanding is that they intend to continue to use this money to make contributions to IMPAC and possibly other PACs. Again, my understanding that Federal law requires that separate political funds must be funded through voluntary contributions.

12044311812

I have included itemized dues billing invoices that were sent to me through my local Board of Realtors for the years 2008-2011. I have put asterisks next to the relevant items.

This is an amended and updated filing to replace that of December 31<sup>st</sup> 2010<sup>th</sup>.

I hereby swear that the contents of this complaint are true to the best of my knowledge.

Subscribed and sworn to before me on this 19<sup>th</sup> day of January 2011

Your's

Paul N. Sidio

Notarized By Teresa Mitchell

Paul N. Sidio  
Ozark Country Realty  
136 Canopy, Spokane MO 65754



12044311813